

RETURN DATE: 04/14/2016
@ 11 AM.
Case # 1-15-43873-NHL

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

RAJ KUMAR THAKUR

Case No.

Chapter: 13

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed application of
RAJ KUMAR THAKUR, Debtor's a hearing will be
held before the Hon. Nancy Hershey Lord, Bankruptcy Judge, to consider the
Debtor's motion for an Order granting relief as follows:

Request To CONVERT TO Chapter 11

Date and time of hearing:

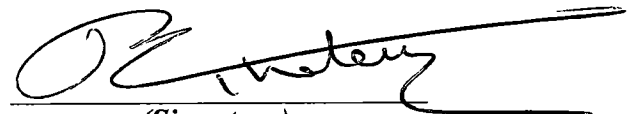
04/14/2016 at
11 AM.

Location :

U.S. Bankruptcy Court
271-C Cadman Plaza East, Ste. 1595
Brooklyn, New York 11201-1800
Courtroom # 2520 2nd Floor

Dated:

03/14/2016


(Signature)

RECEIVED

2016 MAR 14 P 1:37

CLERK
U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF
NEW YORK

EASTERN DISTRICT OF NEW YORK

In re:

RAJ KUMAR THAKUR

Case No.

Chapter: 13

1-15-43873-NHL

APPLICATION IN SUPPORT OF MOTION

To the Hon. Nancy Hershey Lord, Bankruptcy Judge:

I, RAJ KUMAR THAKUR, Debtor's herein, make this application
in support of my motion for the following relief:

Request to Convert to Chapter 11

In support of this motion, I hereby allege as follows:

Documents Attached.

WHEREFORE, Debtor's prays for an Order granting relief requested.

Dated:

03/12/2016.

[Signature]
(Signature)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

RAT KUMAR THAKUR

Case No.

Chapter: 13

1-15-43873-
NHL

CERTIFICATE OF SERVICE

The undersigned certifies that on 03/14/2016, a copy of the annexed papers was served by depositing same, enclosed in a properly addressed postage-paid envelope, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, upon *[below specify the name and mailing address of each party served]:*

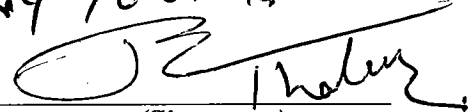
MARIANNE DEROSA,
Standing Chapter 13 Trustee
115 Eileen Way, Suit 105,
Syosset, NY 11791

Please
See
Attached.

US Trustee
Office of United States Trustee
201 Varick Street Suite 1006,
New York, NY 10014.

Dated:

03/14/2016.


(Signature)

LIST OF CREDITORS:-

1. Capital One Bank,
P.O. Box 86057,
Richmond, VA 23285-5057.
Phone# 888-740-8981
2. Chase Card Services,
P.O. Box 15298,
Wilmington, DE 19850
Phone# 800-432-3117
3. Citibank,
P.O. Box 6500,
Sioux Falls, SD 57117.
Phone# 866-696-5673
4. Discover Credit Card,
P.O. Box 71084,
Charlotte, NC 28272-1084.
Phone# 800-347-2683
5. Ally Auto Financial,
P.O. Box 380901,
Bloomington, MN 55438.
Phone# 888-925-2559
6. Ford Credit,
P.O. Box 220564,
Pittsburg, PA 15257-2564.
Phone# 800-727-7000
7. M & T Bank,
P.O. Box 64679,
Baltimore, MD 21264-4679
Phone# 877-686-8424
8. T & D Auto Finance,
P.O. Box 16035,
Lewiston, WE 04243-9517.
Phone# 800-556-8172
9. Toyota Financial Service,
P.O. Box 5855,
Carol Stream, IL 60197-5855.
Phone# 800-874-8822

UNITED STATES BANKRUPTCY COURT

Eastern District of New York
271-C, Cadman Plaza East, Suite 1595,
Brooklyn, NY 11201.

**Case NO. 1-15-43873-NHL
CHAPTER 13**

Raj Kumar Thakur
PO BOX 670634,
Kew Garden Hills,
NY 11367.
S.S # xxx-xx-1474

..... Debtor.

- A. PERMISSION TO CONVERT FROM CHAPTER 13 TO CHAPTER 11**
- B. LOOKING ANOTHER LAWYER TO DEAL MY THIS CASE.**

It is respectfully prayed to your kind Honor that:

1. I have the above stated bankruptcy case pending before the Honorable Trustee Marrienne Derosa.
2. I have my own lawyer i.e. Mr. Bruce Bronson in the above stated case.
3. He is not responding to me for the last many days despite my text messages and emails.
4. But on or about 03.01.2016 I have received the message from his secretary that the trustee needs the current income tax return within two weeks.
5. After it I did not receive any message from Mr. Bruce Bronson about any updates of this case in hand despite my several requests though I have sent him the messages.
6. Now I am not interested to keep this lawyer i.e. Mr. Bruce Bronson any more in this said case because he does not respond to me and I am very upset with my life and moreover I cannot sleep due to worries of this case in hand.

7. Herewith I am also appending my income tax return for your records.
8. **I am willing to convert from chapter 13 to chapter 11 or file the bankruptcy case under chapter 11 without any prejudice if the provisions of law permit me to do so.**
9. The restraining order may please be granted against all the creditors from taking away my all vehicles in the meantime till the disposal of the main case.
10. I am also looking for another lawyer to deal this my own case which will be hired shortly.

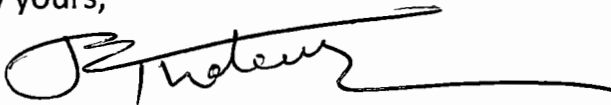
Therefore it is respectfully prayed to your kind Honor to please accept this application and grant me the relief prayed for converting from chapter 13 to chapter 11 or to file the bankruptcy proceedings under chapter 11 without any kind of prejudice to me. An restraining order may also please be granted in this case against the creditors from taking any vehicle of mine till the disposal of the final decision.

It is also further prayed to your kind Honor to please allow me sometime to hire another lawyer for dealing my this case in hand.

Thanks and deepest regards.

Dated: 03.13.2016.

Very Sincerely yours,

-sd- 

(Raj Kumar Thakur) Debtor.

PO Box 670634,
Kew Garden Hills,
NY 11367.

Copy to the Trustee Ms. Marrienne Derosa for your kind knowledge and recommendation or approval or 'no objection' in this case for converting from chapter 13 to chapter 11 of bankruptcy provisions or for filing under chapter 11.